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October 19, 2022

Via Electronic Filing

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Huzhou Chuangtai Rongyuan Investment Management Partnership et al v. Qin, Case No. 1:21-cv-09221-KPF

Dear Judge Failla:

On behalf of Petitioners Huzhou Chuangtai Rongyuan Investment Management Partnership, Huzhou Huihengying Equity Investment Partnership, and Huzhou Huirongsheng Equity Investment Partnership (collectively, “Petitioners”), pursuant to Your Honor’s individual rule 9(B), upon request by counsel for Respondent Hui Qin, and after review of *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006) and *Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132 (2d Cir. 2016), we respectfully submit this letter motion to file certain documents under seal.

On October 13, 2022, Petitioners filed their Motion to Dissolve Automatic Stay of Proceedings to Collect Judgment (the “Motion”). *See* Dkt. Nos. 49-52. In support of the Motion, Petitioners filed the Declaration of Carol Lee (“Lee Decl.”), along with four exhibits. Dkt. No. 51. On October 18, 2022, Respondent’s counsel contacted the undersigned and asked that two of the exhibits to the Lee Decl. be redacted. Specifically, Respondent’s counsel asked that Exhibits 2 and 3 to the Lee Decl. (Dkt. Nos. 51-2 and 51-3) be redacted. Petitioners consented to Respondent’s request to redact certain information in the above-referenced documents. Accordingly, pursuant to Your Honor’s individual rule 9(A), Petitioners redacted certain information in the above-referenced documents and re-filed the partially redacted versions as Dkt. Nos. 56-1 and 56-2.

The Honorable Katherine Polk Failla
October 19, 2022
Page 2

Therefore, upon request by Respondent's counsel and given that partially redacted versions have been filed, we respectfully request that Dkt. Nos. 51-2 and 51-3 be formally sealed and removed from the docket.

Respectfully submitted,

/s/ Andrew C. Smith
Andrew C. Smith

Application GRANTED. The Clerk of Court is directed to maintain Exhibits 2 and 3 to docket entry 51 under seal, viewable only to the parties and the Court.

The Clerk of Court is further directed to terminate the motion at docket entry 57.

Dated: October 19, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE